

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

-----X  
In re:

BERNARD L. MADOFF,

Debtor.

-----X  
IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FRANK AVELLINO, et al.,

Defendants.

Adv. Pro. No. 10-05421 (SMB)

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**JOINT MOTION TO SUBSTITUTE COUNSEL**

Undersigned counsel, pursuant to applicable Federal Rules of Bankruptcy Procedure and Local Rule 2091-1, jointly request an order of this Court approving the substitution of counsel and permitting the withdrawal the law firm of Broad and Cassel, including its undersigned attorney Jonathan Etra, as counsel of record for Defendants Michael S. Bienes, Dianne K. Bienes, and St. James Associates, ("Clients"), in this case. Clients are aware of and have consented to the substitution of counsel requested in this Joint Motion. A copy of the Clients' signed consent to the substitution of counsel is attached to this Joint Motion as **Exhibit A**.

The undersigned attorneys are unaware of any objections to the substitution, and respectfully request entry of an Order Granting the Joint Motion, and requiring that all future correspondence, pleadings, notices and other court filings be directed to:

**Gary A. Woodfield**  
**Florida Bar Number 563102**  
**Haile Shaw & Pfaffenberger P.A.**  
**660 US Highway 1**  
**North Palm Beach, FL 33408-4629**  
**561.627.8100**  
**E-Mail: gwoodfield@haileshaw.com**

SUCCESSOR ATTORNEY:	WITHDRAWING ATTORNEY/FIRM:
By: <u>/s/ Gary A. Woodfield</u> Fla. Bar No: 563102 Haile Shaw & Pfaffenberger P.A. 660 US Highway 1 North Palm Beach, FL 33408-4629 561.627.8100 E-Mail: gwoodfield@haileshaw.com	By: <u>/s/ Jonathan Etra</u> Fla. Bar No: 686905 BROAD AND CASSEL One Biscayne Tower, 21 <sup>st</sup> Floor 2 South Biscayne Boulevard Miami, Florida 33131 Telephone: 305.373.9400 Facsimile: 305.373.9443 E-Mail: jetra@broadandcassel.com

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30<sup>th</sup> day of August, 2016, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, and that the foregoing document is being served this day on all counsel of record or pro se parties via transmission of a Notice of Electronic filing generated by CM/ECF.

/s/ Gary A. Woodfield  
Fla. Bar No: 563102  
Haile Shaw & Pfaffenberger P.A.  
660 US Highway 1  
North Palm Beach, FL 33408-4629  
Phone: 561.627.8100  
E-Mail: gwoodfield@haileshaw.com